

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

CARMEN TURNER

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§

CAUSE NUMBER: 4:16-CR-00282

UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes CARMEN TURNER, Defendant, in the above referenced cause, through Counsel, RALPH R. MARTINEZ, and brings this *Unopposed Motion for Continuance*, and for good cause shows unto the Court the following:

I.

Defendant's pending settings in this cause of action are:

- A. Pretrial Conference is set for August 26, 2016 at 11:45 a.m.;
- B. Jury Trial is set for August 29, 2016 at 1:00 p.m.

II.

Counsel is seeking continuance on the above reference cause. Counsel is still engaged in obtaining more discovery, reviewing discovery, and investigating further.

III.

Assistant United States Attorney, QUINCY L. OLLISON, Attorney of Record for the United States in this cause is unopposed to the continuance proposed by the present *motion*.

IV.

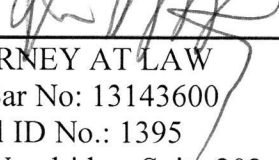
All parties to this cause of action are unopposed to a continuance.

V.

The proposed continuance is not sought for purposes of delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Court enter its order continuing this cause to a date that is convenient to the court.

Respectfully submitted,

By: 

ATTORNEY AT LAW
State Bar No: 13143600
Federal ID No.: 1395
2900 Woodridge, Suite 202
Houston, Texas 77087
Tel: (713) 645-7894
Fax: (713) 645-7777
lalis994@aol.com
Attorney for Defendant,
CARMEN TURNER

CERTIFICATE OF CONFERENCE


I, RALPH R. MARTINEZ, certify that on August 15, 2016, my legal assistant conferred with Assistant United States Attorney, QUINCY L. OLLISON, Attorney of Record for the United States with reference to the disposition of this *Motion* and he is unopposed.

ATTORNEY

QUINCY L. OLLISON
US Attorney's Office-Houston
1000 Louisiana, Suite 2300
Houston, TX 77002
Tel: (713) 567-9717
Fax: (713) 718-3300
Email: quincy.ollison@udoj.gov

RESPONSE

UNOPPOSED

By: 
RALPH R. MARTINEZ
ATTORNEY AT LAW

CERTIFICATE OF SERVICE


I, RALPH R. MARTINEZ, certify that on, August 15, 2016, a true and correct copy of the foregoing *Unopposed Motion for Continuance* has been served upon the following:

SERVED UPON

QUINCY L. OLLISON
US Attorney's Office-Houston
1000 Louisiana, Suite 2300
Houston, TX 77002
Tel: (713) 567-9717
Fax: (713) 718-3300
Email: quincy.ollison@udoj.gov

METHOD

Via CM/ECF

By: 
RALPH R. MARTINEZ
ATTORNEY AT LAW

ORDER FOR A SETTING

On _____, 2016, the Defendant filed a Motion for Continuance.
The Court finds that the party is entitled to a hearing on this matter, and it is THEREFORE ORDERED
that a hearing on this motion is set for _____, at _____.
Signed on _____.

JUDGE PRESIDING